

UNITED STATES DISTRICT COURT  
FOURTH DIVISION  
DISTRICT OF MINNESOTA

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Sandra Jean Rushing,

Plaintiff,

vs

Walgreen Co.,

Defendant.

Civil File No. 22-CV-1357 (PAM/JFD)

**AMENDED NOTICE**  
**FOR REMOVAL**

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TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MINNESOTA:

Pursuant to the Court's May 20, 2022, Order (Doc. 5) Petitioner\Defendant  
Walgreen Co., respectfully shows and alleges the following in support of its  
AMENDED Notice for Removal.

1. Petitioner is the Defendant in an action commenced against them in  
Ramsey County District Court entitled *Sandra Jean Rushing v. Walgreen Co.*,  
A true and correct copy of the Summons and Complaint served upon petitioner is  
attached as Exhibit "A". No further proceedings have taken place in the state  
action.

2. Plaintiff, Sandra Jean Rushing, is and was at all relevant times a citizen  
of the State of Minnesota, Petitioner\Defendant Walgreen is and at all relevant  
times a citizen of the State of Illinois with its principal place of business in the

State of Illinois. Walgreen Co. is and was at all relevant times incorporated in the State of Illinois.

3. Complete diversity exists among the parties to this action and the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

4. Based upon the foregoing, this Court has original jurisdiction for this matter pursuant to 28 U.S.C. § 1332, and the entire matter is one which may be removed to this Court pursuant to 28 U.S.C. § 1441.

5. The Summons and Complaint in the state action was served on May 13, 2022, and Petitioner\Defendant have filed this Notice to Remove within thirty (30) days after service of the Summons and Complaint.

WHEREFORE, Petitioner\Defendant Walgreen Co. prays that the state action pending against them be removed to this Court.

Dated: May 23, 2022

Lind, Jensen, Sullivan & Peterson  
A Professional Association

/s/ Brian A. Wood  
Brian A. Wood #141690  
Attorneys for Defendant Walgreen Co.  
901 Marquette Avenue South, Suite 1300  
Minneapolis, Minnesota 55402  
(612) 746-0151  
Brian.wood@lindjensen.com